

ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED**MAR 30 1998**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

Petitions For Extension Of Time)
Of The Local Number Portability)
Phase II Implementation Deadlines)

AT&T Corp.)
BellSouth Corporation)
GTE Service Corporation)
MediaOne Inc.)
Pacific Bell)
Sprint Local Telephone Companies)
Teleport Communications Group, Inc.)
U S West Communications, Inc.)
Vista-United Telecommunications)
Time Warner Communications)
Holdings, Inc.)

CC Docket No. 95-116
DA 98-538, DA 98-569

NSD File No. L-98-40
NSD File No. L-98-27
NSD File No. L-98-29
NSD File No. L-98-30
NSD File No. L-98-31
NSD File No. L-98-37
NSD File No. L-98-38
NSD File No. L-98-32
NSD File No. L-98-39
NSD File No. L-98-46

COMMENTS OF AT&T CORP.

Pursuant to Sections 1.3 and 52.3(d) of the Commission's Rules, 47 C.F.R. §§ 1.3, 52.3(d), and the Public Notices released March 20, 1998 and March 24, 1998, AT&T Corp. ("AT&T") hereby comments on the petitions for waiver of the Permanent Local Number Portability ("PLNP") Phase II implementation deadline filed by the carriers listed in the caption above (collectively, "petitioners").

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As the Commission recognized in its Phase I Waiver Order,¹ the failure of the former LNP Administrator ("LNPA") in the Western, Southeast and West Coast regions to timely provide a stable Number Portability Administration Center/Service Management System ("NPAC/SMS")² will prevent carriers in those regions from offering long-term portability in compliance with the schedule established in the LNP Reconsideration Order.³ There is no dispute among the petitioners that some delay in the LNP schedule will be necessary for all facilities-based LECs operating in the affected regions. The sole point of contention among the parties concerns the duration of that delay.

AT&T's prior comments and reply comments concerning the petitioners' requests for waiver of the March 31, 1998 Phase I LNP deadline address the same issues raised by the instant petitions, and propose a revised implementation schedule for all LNP Phases in the

¹ Order, Telephone Number Portability, CC Docket No. 95-116, DA 98-152, released January 28, 1998 ("Phase I Waiver Order").

² The NPAC/SMS is

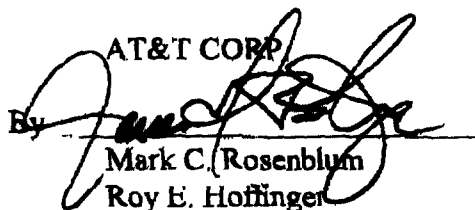
a hardware and software platform that will contain the database of information required to effect the porting of telephone numbers. In general, the Number Portability Administration Center Service Management System will receive customer information from both the old and new service providers, validate the information received, and download the new routing information when an "activate" message is received indicating that the customer has been physically connected to the new service provider's network.

Second Report and Order, Telephone Number Portability, CC Docket No. 95-116, FCC 97-289, released August 18, 1997, ¶ 9, n.28 ("LNP Second Report and Order").

³ First Memorandum Opinion and Order On Reconsideration, Telephone Number Portability, CC Docket No. 95-116, FCC 97-74, released March 11, 1997 ("LNP Reconsideration Order").

affected regions.⁴ Accordingly, AT&T hereby incorporates those comments, including its proposed PLNP implementation schedule, by reference into the record in the above-captioned proceedings concerning waiver of the Phase II LNP deadline.

Respectfully submitted,

AT&T CORP.
By 
Mark C. Rosenblum
Roy E. Hoffinger
James H. Bolin, Jr.

Its Attorneys

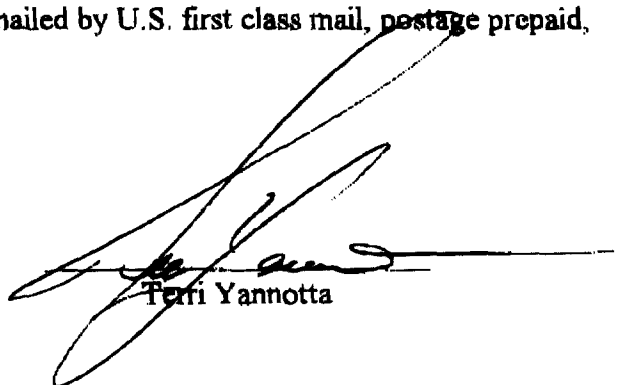
Room 3247H3
295 North Maple Avenue
Basking Ridge, NJ 07920
(908) 221-4617

March 30, 1998

⁴ See Comments of AT&T Corp., filed March 12, 1998, in Telephone Number Portability, CC Docket No. 95-116, DA 98-451; Comments of AT&T Corp., filed March 12, 1998, in id., DA 98-449; Reply Comments of AT&T Corp., filed March 17, 1998 in id., DA 98-451 & DA 98-449.

CERTIFICATE OF SERVICE

I, Terri Yannotta, do hereby certify that on this 30th day of March, 1998, a copy of the foregoing "Comments of AT&T Corp." was mailed by U.S. first class mail, postage prepaid, to the parties listed on the attached service list.



Terri Yannotta

March 30, 1998

SERVICE LIST

Richard M. Rindler
Morton J. Posner
Swidler & Berlin, Chartered
3000 K Street, N.W., Suite 300
Washington, DC 20007
(Attorneys for Allegiance
Telecom, Inc.)

M. Robert Sutherland
Theodore R. Kingsley
BellSouth Corporation
1155 Peachtree Street, Suite 1700
Atlanta, Georgia 30309-3610

Russell M. Blau
Morton J. Posner
Swidler & Berlin, Chartered
3000 K Street, N.W., Suite 300
Washington, DC 20007
(Attorneys for DeltaCom, Inc.)

Eric J. Branfman
Morton J. Posner
Swidler & Berlin, Chartered
3000 K Street, N.W., Suite 300
Washington, DC 20007
(Attorneys for GST Telecom
California, Inc.)

Richard McKenna
GTE Service Corporation and affiliated
domestic telephone operating
companies
P.O. Box 152092
Irving, TX 75015-2092

Gail L. Polivy
GTE Service Corporation and affiliated
domestic telephone operating
companies
1850 M Street, N.W.
Washington, DC 20036

Glenn B. Manishin
Blumenfeld & Cohen – Technology Law
Group
Suite 700
1615 M Street, N.W.
Washington, DC 20002
(Attorney for MCI
Telecommunications Corp.)

Donna M. Roberts
MCI Telecommunications Corp.
1801 Pennsylvania Avenue, N.W.
Washington, DC 20006

Kathryn Marie Krause
Dan L. Poole
1020 19th Street, N.W.
Suite 700
Washington, DC 20036
(Attorneys for MediaOne, Inc.
and U S West Communications,
Inc.)

Karen Potkul
NEXTLINK California, L.L.C.
1924 Deere Avenue
Santa Ana, CA 72705

Robert M. Lynch
Durward D. Dupre
Pacific Bell
One Bell Plaza, Suite 3703
Dallas, Texas 75202

Nancy C. Woolf
Pacific Bell
140 New Montgomery Street
Rm. #1522A
San Francisco, CA 94105

Jay C. Keithley
Sprint Corporation
1850 M Street, N.W.
11th Floor
Washington, DC 20036-5807

Sandra K. Williams
Sprint Corporation
P.O. Box 11315
Kansas City, MO 64112

Teresa Marrero
Teleport Communications Group, Inc.
Two Teleport Drive, Suite 300
Staten Island, NY 10311

Richard S. Whitt
Anne F. La Lena
WorldCom, Inc.
1120 Connecticut Avenue, N.W.
Suite 400
Washington, DC 20036

John P. Fons
J. Jeffry Wahlen
Ausley & McMullen
Post Office Box 391
Tallahassee, Florida 32302
(Attorneys for Vista-United
Telecommunications)